1	TODD M. I EVENTUAL ESO				
2	TODD M. LEVENTHAL, ESQ Leventhal and Associates, PLLC				
3	Nevada Bar No. 8543 California Bar No. 223577				
	626 South Third Street				
4	Las Vegas, Nevada 89101 PHONE: (702) 472-8686				
5	leventhalandassociates@gmail.com Attorney for Leonardo A. Oliveira Santos				
6					
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA				
8		I			
9	THE UNITED STATES OF AMERICA,	Case no.: 2:17-CR-00001-JAD-CWH			
10	Plaintiff,				
11	VS.	STIPULATION TO CONTINUE			
12	LEONARDO A. OLIVEIRA SANTOS,	SENTENCING AND DISPOSITION			
13	Defendant.				
14	IT IS HEREBY STIPULATED AND AGREED by and between Defendant,				
15	LEONARDO A. OLIVEIRA SANTOS, by and through his counsel, TODD M. LEVENTHAL,				
16	ESQ., and the United States of America, by its counsel, JOHN P. BURNS, Assistant U.S.				
17	Attorney, that the Sentencing and disposition in the above-captioned matter currently set for				
18	Monday, June 11, 2018 be re-set for 60 days out at the courts convenience.				
19	This Stipulation is entered into for the following reasons				
20	1. There are pending issues that remain which are vital to the Sentencing and Disposition of				
21	Mr. Oliveira-Santos.				
22	2. Mr. Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he				
23	has no objection to continue the hearing.				
24	3. Mr. Oliveira- Santos is currently in custody and agrees with this request.				

1	4. Additionally, denial of this request for a continuance could result in a miscarriage of				
2	justice.				
3					
4	DATED this 30 <sup>th</sup> day of May, 2018				
5	21122 and 00 and 0111an, 2010				
6					
7					
8	Counsel for Leonardo A. Oliveira Santos Assistant U.S. Attorney				
9					
10	Submitted By: LEVENTHAL AND ASSOCIATES, PLLC.				
11	Submitted By, BE VERTINE THE TROSCONTIES, TEBE.				
12					
13	By: <u>/s/ Todd M. Leventhal</u> TODD M. LEVENTHAL, ESQ.				
14	Leventhal & Associates, PLLC. Nevada Bar No. 008543				
15	California Bar No. 223577 626 S. 3 <sup>rd</sup> Street				
16	Las Vegas NV 89101 T: (702) 472-8686				
17	leventhalandassociates@gmail.com Attorney for Defendant				
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6	UNITED STATES DISTRICT COURT				
7	DISTRICT OF NEVADA				
8					
		NAMED OF A PERIOD			
9	THE C	JNITED STATES OF AMERICA,	Case no.: 2:17-CR-00001-JAD-CWH		
10		Plaintiff,			
11	VS.		STIPULATION TO CONTINUE		
12	LEON	ARDO A. OLIVEIRA SANTOS,	SENTENCING AND DISPOSITION		
		Defendant.			
13					
14	FINDINGS OF FACT				
15					
16	Based on the Stipulation of counsel, and good cause appearing, the Court finds that:		good cause appearing, the Court finds that:		
17	1.	There are pending issues that remain wh	ich are vital to the Sentencing and Disposition of		
18	Mr. Oliveira-Santos.				
19	2. Mr. Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he				
20	has no objection to continue the hearing.				
21	3. Mr. Oliveira- Santos is currently in custody and agrees with this request.				
22	4. Additionally, denial of this request for a continuance could result in a miscarriage of				
23		justice.			
24					

1 **CONCLUSIONS OF LAW** 2 1. For all the above-stated reasons, the ends of justice would best be served by granting the 3 requested continuance of the current Sentencing date for at least 120 days at a time 4 convenient for the court. 5 6 **ORDER** 7 Accordingly, IT IS SO ORDERED that the current **Sentencing Hearing** is vacated and 8 the same is continued and reset for August 13, 2018, at the hour of 11:00 a.m. 9 10 DATED this 31st day of May, 2018. 11 12 JENNIFER A. DORSEY 13 UNITED STATES DISTRICT JUDGE 14 15 **CERTIFICATE OF SERVICE** 16 I hereby certify that on the 30<sup>TH</sup> day of MAY, 2018 a true and correct copy of the, 17 STIPULATION AND ORDER TO CONTINUE SENTENCING AND DISPOSITION was 18 filed through the CM/ECF filing system and was electronically served to the following registered 19 addresses on file for this instant case: 20 John Patrick Burns: John.P.Burns@usdoj.gov, USANV.team2@usdoj.gov, veronica.criste@usdoj.gov 21 22 /s/ Todd M. Leventhal\_ 23 An Employee of TODD M. LEVENTHAL, ESQ. LEVENTHAL & ASSOCIATES, PLLC. 24